

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE

Rosalind C McCrea

DEBTOR

: BK NO. **17-10825-JKF**

: Chapter 13

:

Motion for Leave to Withdraw as Counsel.

Michael D. Ward, Attorney at law hereby applies to for leave
or Court to withdraw his appearance as attorney for the Debtor,
Rosalind C McCrea, on the following grounds:

1. The Debtor and Movant seemed to have come to irreconcilable differences.
2. Movant, despite efforts to do so, seems to be unable to communicate with the Debtor in a way that is productive for her case and that allows Movant to fulfill his role as her, the Debtor's, attorney in a way that he understands he is supposed to and is obligated to as long as he is the Debtor's counsel.
3. Although Movant only has included \$3,310.00 for additional attorney's fees under the current Debtor's current proposed Amended Plan, Movant as Debtor's counsel on an hourly basis has over \$8,000.00 worth of hours of work at present.

WHEREFORE, Movant, Michael D. Ward, Attorney at law

respectfully requests that this Honorable Court enter an Order allowing him to withdraw his appearance on behalf of the Debtor, **Rosalind C McCrea** .

Date: March 25, 2018

/s/ Michael D. Ward, Esq.
Attorney for debtor